Message

From: O'Loughlin, Connor [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D1F369DA6C9547ED90366BFB7C59510B-OLOUGHLIN,]
Sent: 11/19/2019 1:30:59 PM
To: Taylor, Daniel [taylor.daniel@epa.gov]; Nevshehirlian, Stepan [Nevshehirlian.Stepan@epa.gov]
Subject: FW: Blades Groundwater EPA Site Investigation and NPL Proposal Notice
Attachments: 20191115171730.pdf; Town Water PFAS.pdf; Water Effluent #2.pdf

Dan and Stepan,

An FYI, I wanted to keep you in the loop. I think these are some important details that should be discussed a bit further with the PRP.

Connor O'Loughlin P.G.
Environmental Protection Agency, Region III
Superfund & Emergency Management Division (SEMD)
Site Assessment Manager, (3SD12)
1650 Arch Street,
Philadelphia, PA 19103-2029
phone 215-814-3304
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From: Nonresponsive based on revised scope @tenbears.us>
Sent: Monday, November 18, 2019 3:04 PM
To: O'Loughlin, Connor <oloughlin.connor@epa.gov>
Cc: Mike <mike@procino.net>; Nonresponsive based on revised scope <kyle@tenbears.us>
Subject: FW: Blades Groundwater EPA Site Investigation and NPL Proposal Notice

Connor,
I passed along your message to Mr. Procino, reviewed Procino Plating's use of Fumetrol with him, and have some thoughts to share with you.

- The fire shown in the photos occurred on April 3, 2017. Link to incident log: http://blades71.com/incidents/detail/516063. Had to scroll a long way through Facebook page to find photos. Here's the first: https://www.facebook.com/Station71Blades/photos/a.1149616915058191/1506137612739451/?type=3&theater. Click right arrow for several more.
- We weren't attempting to claim that no PFAS products could have entered the ground from Procino anywhere on site. However, the PFAS found in groundwater at Procino do not appear to match the chromium release pattern & an associated Procino PFAS release wouldn't likely concentrate at the northwestern corner of the property, the fire location.
- MSDS Sheets for Fumetrol products used by Procino are attached.
- The Fumetrol was used for chromium fume suppressant, as mandated by the State of Delaware.
- Procino used Fumetrol 140 (with PFOS) from 1992 until sometime between April 2015, when the last batch was purchased and September 2015, when the substitute PFOS-free compound was employed.
- 1st MSDS sheet (from 1992) indicates Fumetrol 140 as containing unspecified 'perfluorosulfonate', whereas the 2nd MSDS (from 2009) is PFOS
- Since September 2015, Procino has used Fumetrol 21 (with polyfluorosulfonic acid, 3rd MSDS).
- Fumetrol 21 (with polyfluorosulfonic acid) would have been in the bath during the 2018 spill, not Fumetrol 140 (PFOS).
- Mr. Procino is unaware of the existence of any process discharge leaving the building to the west or behind the buildings. There is a sewage holding / pumping tank just outside the western wall of Building #2 that only serves the adjoining bathroom per attached sketch. Mr. Procino is fairly certain that all chromium process wastes were discharged, after treatment, through 2 pipes leading from the north-central portion of the property to the sanitary sewer in the roadway north of the building, and to the POTW. Could

you share the geophysical information indicating piping leading west or back of the building, so that these pipes can be explored to determine their configuration, composition, termination, and, hopefully, purpose?

- As you are most likely aware, per the attached test results for the Town of Blades wells, the only results above the HAL were for PFOS, which has not been used at Procino since 2015. (note CAS # does not match Fumetrol 21)
- Also, it may be worth noting that the SI well at Procino in the northwest corner with the highest PFOS, contained no detectable PFOA (2,850 ug/L vs. ND>8.62). Of the 16 other onsite wells, 14 contained detectable PFOA, though still with PFOS an order of magnitude higher.

Thanks again for your consideration.

Best,

[redacted]

From: O'Loughlin, Connor [mailto:oloughlin.connor@epa.gov]
Sent: Tuesday, November 12, 2019 5:07 PM
To: [redacted]@tenbears.us>
Subject: RE: Blades Groundwater EPA Site Investigation and NPL Proposal Notice

[redacted]

Thank you for the information. I scoured the photo from the Blades fire department site. I could not identify the page with the fire you reference from April 3, 2017. Could you send me the link please to the site. I am unable to locate it.

The chemical that I identified that contains PFAS is Fumetrol 140. The preliminary assessment has a photo showing it was onsite and used in the processes. During the recent spill in 2018 the compound was still used as well. The sampling onsite showed that 17 of 18 wells onsite had concentrations of PFAS in them. The highest concentration was in the corner at MW-2.

The PFAS may have been separated from the chrome during the treatment process previously used to manage the electroplating metals/compounds and ended up in the drain systems which flow west out back of the building. The PFAS also would only have been treated if carbon was used. The old system appeared to only process metals and would therefore leave behind the PFAS. All of these discussions can be had during the next phases of the RI/FS. I am happy to have a call with you and Mr. Procino at some point. I will be away until the 18th so we can talk any time after that.

Thank you.

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From [redacted]@tenbears.us>
Sent: Tuesday, November 12, 2019 3:48 PM
To: O'Loughlin, Connor <oloughlin.connor@epa.gov>
Cc: Procino Plating (Mike@Procino.net) <Mike@Procino.net>; [redacted]@tenbears.us>
Subject: RE: Blades Groundwater EPA Site Investigation and NPL Proposal Notice

Connor,

After our discussion, I spoke with Mr. Procino about his operations to try to understand how the PFAS may have found its way into the groundwater near the northwestern corner of his facility. We were discussing the general lack of correlation between PFAS & chrome in groundwater, which is primarily in the central / southern portion of the site and extending southward. I asked about the air handler near the corner of the building, which he indicated was solely exhaust from one process involving a single product that does not contain PFAS. I asked if he ever had a fire there that may have had foam applied. He recalled a facility fire from 2017 in that exact area and was able to find the attached photographs from the Blades Fire Co's Facebook page (1st 2 photos). Sure looks like foam, along with water, on the ground in front of the northwestern corner of the building, and extending onto the roadway. The 3rd photograph is from GoogleEarth (I pulled it today, but photograph is dated 2018), facing the northwest corner of Procino from the roadway to the north.
Was this incident in the fire records you were able to obtain?
Were you able to identify what type of firefighting foam Blades has been using?
If so, can you provide?
Also, are you available to meet with me and Mr. Procino some time prior to the December hearing?
Thanks in advance for your help.
Best regards,

Nonresponsive based on revised scope

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From: O'Loughlin, Connor [mailto:oloughlin.connor@epa.gov]
Sent: Tuesday, October 29, 2019 4:21 PM
To: Procino Plating (Mike@Procino.net) <Mike@Procino.net>
Cc: Nonresponsive based on revised scope @tenbears.us>; Thomas, Christopher <Thomas.Christopher@epa.gov>; Miles, Amanda <miles.amanda@epa.gov>
Subject: Blades Groundwater EPA Site Investigation and NPL Proposal Notice

Blades Groundwater - Advanced Public Notice

Mr. Procino,

Good afternoon. Previously, we discussed the EPA funded Metals/PFAS site assessment and groundwater investigation of the greater Blades Delaware area. This correspondence is to notify you that tomorrow EPA and DNREC will issue a joint public notice discussing the Blades Groundwater Site. The EPA has finalized the Site Inspection (SI) (previously provided to you), and the Hazard Ranking Package (HRS) documents (up for public

comment). The EPA lead and funded Site Investigation (SI) which has indicated further investigatory activities are required due to ongoing contamination. I wanted to give you advanced notice and inform you that EPA has completed the HRS package and has determined that the Blades Groundwater Site qualifies for the NPL and has been proposed to the National Priorities List (NPL). The Procino Plating and Peninsula Plating facilities are included in the plume's boundaries and therefore are incorporated in the NPL listing. The main purpose of future ongoing activities will be to assess the hydrology of the plume as well as how the public and residential wells became contaminated. Your assistance regarding the past sampling events have been helpful and I hope to continue working with you to conduct further investigations and remediation.

If you have any question please don't hesitate to call. Thank you very much.

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